

# Black River Broadcasting

April 20, 1993

Federal Communication Commission  
1919 M Street N.W.  
Washington, D.C. 20554

Re: Docket No. 92-298

Dear Commissioners;

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

WTNY AM in Watertown, New York, has been using the Kahn AM Stereo system since 1986. We purchased the Kahn equipment because my examination of the various AM stereo systems available at the time determined the Kahn system to be technically superior and most compatible with possible future uses of the AM carrier. As an example- Niagara Mohawk Power Corporation has contemplated the experimental use of a low frequency subcarrier to enable remote readings of rurally located power meters, etc. that would not be possible with a C-Quam pilot.

The primary argument for the Motorola system and the primary reason for any broadcaster choosing the Motorola system has been the availability of receivers. Motorola's blocking of multi-mode receivers in the United States seems to have been a "back-door" attempt to pressure broadcasters to choose the C-Quam system. This attempt has slowly failed. The average AM broadcaster does not have the resources to broadband its' antenna system- a reasonable requirement for the correct operation of the C-Quam system. The receiver issue is relatively mute. In 1990, both Radio Shack and Crutchfield (a major mail order car radio company) listed C-Quam AM stereo products in their catalogs. I am not able to find any in their current catalogs.

Please consider the overall picture of AM radio in your decision. The situation would be much different if multi-mode receivers had been available since the beginning. I feel that even if C-Quam is chosen as the AM stereo standard, that the growth in AM stereo stations will be extremely slow and that the impact on the success or failure of stations on the AM band will be negligible.